

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

(1) LESLIE BRIGGS, as next friend of T.W.
and B.S.;
(2) EVAN WATSON, as next friend of C.R.;
and,
(3) HENRY A. MEYER, III, as next friend of
A.M., for themselves and for others similarly
situated,

Plaintiffs,
v.

(1) CARRIE SLATTON-HODGES, in her
official capacity as the Commissioner of the
Oklahoma Department of Mental Health and
Substance Abuse Services; and
(2) CRYSTAL HERNANDEZ, in her official
capacity as Executive Director of the
Oklahoma Forensic Center,

Defendants.

Case No.: 23-cv-00081-GKF-JFJ

JOINT MOTION TO AMEND STIPULATED PROTECTIVE ORDER

For their Joint Motion to Amend Stipulated Protective Order, the Parties state the following:

1. At the request of the Parties, the Court entered a Stipulated Protective Order in this matter on April 11, 2023. Doc. 18.

2. Since the Stipulated Protective Order has been entered, the Parties have begun conducting discovery and exchanging documents in this matter.

3. During the course of discovery, the Parties have determined that there are documents which contain Patient History Information (“PHI”), and Patient Identifying Information (“PII”) which is protected by both Federal and State Law.

4. As such, the Parties may not exchange PHI and PII documents without either heavily redacting those documents or without having the necessary language under 42 C.F.R. §§ 2.1 *et seq.* and 43A O.S. § 1-109 in the protective order.

5. The Parties agree that Patient History Information and PII may be relevant to resolving the underlying issues in this matter.

WHEREFORE, The Parties respectfully request this Court to amend the Stipulated Protective Order to include language which covers Patient History Information and Patient Identifying Information in compliance with 42 C.F.R. §§ 2.1 *et seq.* and 43A O.S. § 1-109.

Respectfully submitted,

/s/ Devan A. Pederson

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*/s/ Paul DeMuro – signed by Devan A. Pederson with
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*/s/Nick Southerland – signed by Devan A. Pederson with
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CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of May, 2023, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to counsel of record who are ECF registrants.

/s/Devan A. Pederson

Devan A. Pederson